

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 480554

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In the Matter of)
)
 Amendment of Section 73.606(b),)
 Table of Allotments,)
 Television Broadcast Stations, and)
 Amendment of Section 73.622(b),)
 Table of Allotments,)
 Digital Television Broadcast Stations)
 (Moscow, Idaho))

MB Docket No. 02-3 15
 RM-10566

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

To: Chief, Video Services Division

COMMENTS OF KSKN TELEVISION, INC.

KSKN Television, Inc., a subsidiary of Belo Corp. (collectively, "Belo"), by its attorneys, hereby submits these comments in support of the Notice of Proposed Rule Making proposing (1) to amend the Television Table of Allotments to change the NTSC allotment for station KUID-TV, Moscow, Idaho from Channel *35 to Channel *12 and (2) to amend the Digital Television ("DTV") Table of Allotments to change the station's DTV allotment from Channel *12 to Channel *35, as requested by State Board of Education, State of Idaho ("Idaho PTV").¹

Belo is the licensee of KSKN(TV), Spokane, Washington. KSKN has been allotted DTV Channel 36 for its digital operations. Belo is severely constrained in its ability to increase KSKN-DT's power on Channel 36 to a level comparable to that of other stations in the market due to the presence of the current Channel 35 DTV allotment for KUID-DT. Accordingly, on January 25, 2002, Belo submitted a Petition for Rule Making proposing that KSKN's initial DTV

¹ See Notice of Proposed Rule Making, MB Docket No. 02-315, RM-10566 (rel. October 9, 2002).

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channel allotment be changed to Channel 48 so that it can increase power to achieve parity in the Spokane market and provide DTV service to a much greater population. On August 9, 2002, the aware FCC released a Notice of Proposed Rule Making proposing to change KSKN-DT's channel from 36 to 48.²

In the comment stage of the KSKN rulemaking proceeding, however, Belo became aware that KUID's proposal to exchange its allotted analog and digital channels could potentially allow KSKN-DT to increase its signal strength on its currently allotted Channel 36. Specifically, KHQ, Incorporated, the licensee of KHQ-TV, Spokane, Washington, and television translator K48DX, Sandpoint, Idaho, filed comments noting that KUID's proposed operation of its analog facility on Channel 35 would allow KSKN-DT to maximize its digital facilities without moving to Channel 48 and, consequently, forcing K48DX to discontinue service.

Belo has carefully analyzed this change in circumstances and determined that if the exchange of KUID's analog and digital allotments is made permanent as Idaho PTV has requested in the instant rulemaking proceeding, then Belo could, in fact, increase KSKN-DT's power on Channel 36 and achieve parity with other stations in the Spokane market. Accordingly, in its reply comments filed in the KSKN rulemaking proceeding, Belo respectfully requested that the Commission temporarily withhold further action on its proposal to change the KSKN-DT allotment to Channel 48 and to resolve the instant proceeding as expeditiously as possible.

In sum, a grant of the channel change proposal requested by Idaho PTV in the instant proceeding would result in a preferential arrangement of allotments by allowing KSKN-DT to maximize its facilities on its current Channel 36 allotment and thereby prevent the displacement

² See Notice of Proposed Rule Making, MB Docket No. 02-222, RM-10491 (rel. August 9, 2002)

of television translator station K48DX. Accordingly, for the reasons set forth above, Belo supports the Commission's proposal to amend the Television Table of Allotments and Digital Television Table of Allotments to specify NTSC Channel 35 and DTV Channel 12 at Moscow, Idaho.

Respectfully submitted,

KSKN TELEVISION, INC.

By: 
John M. Burgett

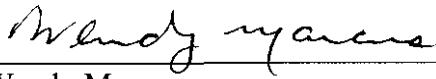
WILEY REIN & FIELDING LLP
1776 K Street, NW
Washington, DC 20006
202.719.7000

Its Attorneys

December 2, 2002

CERTIFICATE OF SERVICE

I, Wendy Marcus, hereby certify that on this 2nd day of December 2002, caused copies of the foregoing "Comments of KSKN Television, Inc." to be mailed via first class postage prepaid mail to the following:



Wendy Marcus

Anne Goodwin Crump
Fletcher Heald & Hildreth
1300 North 17th Street
Eleventh Floor
Arlington, VA 22209
(Counsel for State Board of
Education, State of Idaho)